

differs greatly from that of flat panel displays. They are not interchangeable in certain cases, as in the applicant's claims, *where the display screen angle is to be adjusted through wide orientations*. In fact, the size and bulk of CRT monitors *makes it impossible to implement* with the adjustment means as required by flat panel displays. In order to design a CRT position adjustment apparatus for orientation in both elevation and inclination, *very complex* support arm and assist means must be implemented. For example, see the Hillary's very complex and expensive CRT adjustment means. Flat panels, on the other hand, can be made to be moved and positioned with very different and less complex means. **No prior art exists** that *combines* a wide position adjustment means to a flat panel display, pen input *and* computer means, plus the further limitations of the applicant claims.

Inoue IVO Nagaoka

Inoue merely teaches a flat panel display holder and extension arm position adjustment apparatus. The applicant still disagrees that Inoue discloses a "main unit". Please note that the applicant defines a main unit as: *"an enclosure or housing for control electronics including a digital computer, microprocessor or other control means."* [Spec. page 5, line 11-14] If studied closely, one can see that Inoue does not teach or disclose a main unit. Inoue's element 3.0 is merely a support "arm part", forming several subordinate support arm components (3.1 through 3.7). Inoue does *not* teach, nor anticipated, a main unit with enclosure for control electronics; nor is there any motivation in Inoue, even in view of Nagaoka or other prior art, to make the modifications necessary to embody the applicant's claims.

Nagaoka does not teach a screen elevation means or pen input means. What teachings or motivation in Nagaoka is there for making such modifications? Look at the modifications necessary to obtain the applicants combination. First, the screen must be disconnected from the enclosure, some how a hinged elevation means must be designed to connect both, a pen input means must be design and interfaced to the computer, and the keyboard must be removed from the enclosure. It is not obvious for a person with an ordinary skill in the art, viewing both Inoue and Nagaoka, at the time of the applicant's invention, to make such modifications. The applicant's claims provide a new and surprising result -- namely, a flat panel display-tablet combination with unexpected ergonomic pen writing, viewing and interaction operation.

Inoue *does not specifically teach* azimuth angle adjustment. Azimuth angle adjustment is defined by the applicant to be a rotation D about the vertical axis [page 6 line 29 and Fig. 2]. Inoue does teach a tilt mechanism in his Fig. 10, which allows small inclinations about the axis of pivot 46, normal to the paper.

Inoue IVO Nagaoka and Hawkins

The same arguments as stated above for Inoue IVO Nagaoka apply here as well, plus the following arguments. As to Hawkins et al, the applicant agrees they teach a flat panel display, a pen input means and a keyboard. However, they do not teach nor anticipate a screen elevation means, a separate keyboard, or a usable main unit. Hawkins *does not teach* a means for elevating the screen to eye level as the applicant invention does. The entire motivation of Hawkins et al is to provide a portable laptop computer that embodies a complex hinge arrangement for folding the display panel for a multiplicity of screen angles and for folding it closed for carrying. Hawkins does not teach or anticipated large vertical elevation adjustment, and there is not a motivation to do so. Their keyboard is attached to their housing, which is a severe disadvantage with pen computing. Hawkins' housing 10, is so small that they must provide for and added shape of region 18 on the bottom of the housing for the hardware components. However, this space is still too small for the required computer components such as printed circuit board, disk or flash mass memory devices, battery package, modem, as other required associated electronics. After closely studying Inoue, Nagaoka and Hawkins, the applicant sincerely believes that there are no motivations in them to make such modifications. Thus the applicable claims of the applicant are non-obvious and should be allowed.

Hillary IVO Nagaoka

As to Hillary et al, teaches a very complex CRT display position adjustment means consisting of a platform, boom, lift levers, crank, gas strut, and other required elements. This complex gas strut assisted adjustment means is required because of the inherent bulk and weight of the CRT. The point of novelty of the applicant's invention is to use a flat panel display and very *simple* position means. Hillary does not teach flat panel display, pen input means, main unit with electronics, or tiltable display. There is no motivation in Hillary to modify and combine their unit with pen input. As to a tiltable display, Hillary teaches parts "to maintain the platform, and consequently the display, at a constant orientation to the horizontal" [Column 5, line 35]. If one with an ordinary skill in the art, looked at Hillary and Nagaoka, at the time of the applicant's invention, it would not be obvious to make the modification necessary to make the applicant invention. Therefore, the applicant's claims are non-obvious and should be allowed.

Summary

The applicant *respectively* believes that the examiner is combining several references to argue obviousness with his present day hindsight and with the applicant's disclosure in mind. By law, the examiner cannot pick and choose parts from multiple references to make

arguments for obviousness against the applicant's claims -- *with present day hindsight*. There must be some *teaching*, *anticipation* or *motivation* in the prior art references to make the particular modifications as claimed by the applicant. There are no such anticipation, teachings, or motivations in the prior art to make the claimed modifications of the applicant. Nagaoka and Hawkins disclose roughly standard laptop inventions without position adjustments means. Inoue and Hillary teach display adjustment means without computing means or pen input means. There is no motivation in Inoue or Hillary's disclosure do make the modifications to add computing means and other claimed limitations. There is no motivation in Nagaoka and Hawkin's disclosures for adding elevation position adjustment means. Therefor, the applicant respectfully *requests* that all the new claims be allowed.

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Sincerely,

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